

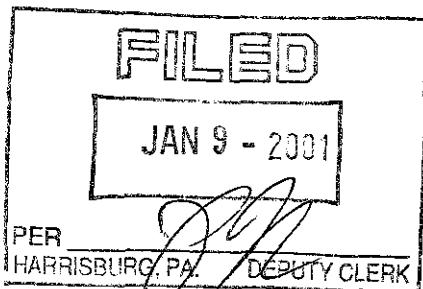
IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

JOHN RICHARD JAE

CIVIL NO. 1:00-cv-01090-SHR

Plaintiff

vs.

DR. ROBERT CLARK,  
MARTIN L. DRAGO RICH,  
JOHN A. PALAKOITCH,  
ROBERT N. NOVOTNEY,  
MICHAEL J. KAZOR, and  
JOHN ANDRADESU.S. DISTRICT JUDGE James  
MAGISTRATE JUDGE AmyeMOTION FOR APPOINTMENT OF COUNSEL

COMES Now, the Plaintiff & As Se Cousel in the above entitled Civil Action, John Richard Jea a Layman Unlettered in the Knowledge of the Laws & Legal Procedures with the United States, pursuant to U.S.C. § 1915(e)(1) & now files his Motion for Appointment of Counsel, who, avers, deposes & states:

1. The Plaintiff is unable to afford Counsel.
2. The issues involved in this case are complex, but non-technical.
3. The Plaintiff, as a Special Inmate, has extremely limited access to the SMU Main Law Library & the Legal Materials contained therein are extremely limited.
4. The Plaintiff has a limited knowledge of the law, especially pertaining to a showing of imminent danger of serious physical injury.
5. Plaintiff requests that this Court request Attorney Angus R. Love, Executive Director of the Pennsylvania Institutional Law Project to represent this Plaintiff as Mr. Love is familiar with him & this case.

RESPECTFULLY SUBMITTED

(S)

John Richard Jea

#BQ 2219  
SCB-Greene L M U  
125 Progress Drive  
Waynesburg, PA 15370

Dated: 31st December 2000